

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEBRA HUNT,

Plaintiff,

vs.

ARAMARK FACILITY SERVICES, INC.,

Defendant.

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Court No. 1:19-cv-550

**NOTICE OF REMOVAL OF ARAMARK HEALTHCARE SUPPORT SERVICES, LLC
(INCORRECTLY SUED AS "ARAMARK FACILITY SERVICES, INC.")**

Defendant, Aramark Healthcare Support Services, LLC (incorrectly sued as “Aramark Facility Services, Inc.”), pursuant to 28 U.S.C. § 1446 and the Local Rules of the United States District Court for the Northern District of Illinois, notifies this Honorable Court that the above-entitled cause has been removed from the Circuit Court of Cook County, County Department, Law Division, to the United States District Court for the Northern District of Illinois, Eastern Division, and in support thereof, states as follows:

STATEMENT OF THE CASE

1. On December 19, 2018, Plaintiff, Debra Hunt, filed a complaint in the Circuit Court of Cook County, Illinois, Law Division, alleging personal injuries arising out of a slip and fall accident. (See Plaintiff’s Complaint attached as Exhibit A.)

2. The Defendant was served via its registered agent on January 3, 2019.

DIVERSITY JURISDICTION UNDER 28 U.S.C. § 1332(a)

3. This action is one over which the Court has original jurisdiction under the provisions of 28 U.S.C. § 1332, and may be removed to this Court pursuant to the provisions of 28 U.S.C. §

1441 because it is a civil action wherein the matter in controversy exceeds the sum or value of \$75,000 exclusive of interests and costs, and is between citizens of different states.

4. Complete diversity exists between the parties because:

(A) Upon information and belief, Plaintiff Debra Hunt is a natural person domiciled in the State of Illinois;

(B) Defendant Aramark Healthcare Support Services, LLC is a limited liability company organized under the laws of the State of Delaware with its principal place of business in the Commonwealth of Pennsylvania;

(i) Aramark Healthcare Support Services, LLC is 100% owned by Aramark Services, Inc., a corporation organized under the laws of the State of Delaware with its principal place of business in the Commonwealth of Pennsylvania. Aramark Services, Inc. is 100% owned by Aramark Intermediate HoldCo Corporation, a corporation organized under the laws of the State of Delaware with its principal place of business in the Commonwealth of Pennsylvania. Aramark Intermediate HoldCo Corporation is 100% owned by Aramark, a corporation organized under the laws of the State of Delaware with its principal place of business in the Commonwealth of Pennsylvania. There are no other members of Aramark Healthcare Support Services, LLC.

5. Upon information and belief, Plaintiff is seeking damages in excess of \$75,000, exclusive of interest and costs, based upon the allegations in her complaint which seek damages in

excess of \$50,000 for severe and permanent injuries of a personal and pecuniary nature including lost wages, disability, past and future medical expenses. *See* Ex. A at ¶ 7.

6. Consequently, proper diversity of citizenship exists between the parties as required under 28 U.S.C. § 1332, and the amount in controversy in this case exceeds the jurisdictional limit of \$75,000.00, exclusive of interest and costs.

7. The requisite elements of jurisdiction have been satisfied and diversity of the parties exists which entitles the Defendant to remove this action to the United States District Court for the Northern District of Illinois, Eastern Division, pursuant to 28 U.S.C. §§ 1332 and 1446.

WHEREFORE, the Defendant, Aramark Healthcare Support Services, LLC (incorrectly sued as “Aramark Facility Services, Inc.”), notifies this Court that this cause has been removed from the Circuit Court of Cook County, Illinois, County Department, Law Division, to the United States District Court for the Northern District of Illinois, Eastern Division, pursuant to the provisions of 28 U.S.C. § 1446 and the Local Rules of the United States District Court of the Northern District of Illinois.

Respectfully submitted,

By: /s/ Craig M. Derrig
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CERTIFICATE OF SERVICE

I hereby certify that on the **28th** day of **January 2019**, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

and I hereby certify that I will e-mail and mail the document by U.S. Mail to the following non-filing user:

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Attorney for Plaintiff, Debra Hunt

By: /s/ Craig M. Derrig